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MEMO ENDORSED

June 2, 2022

Via ECF and email

Hon. Andrew L. Carter Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
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DATE FILED: June 3, 2022

Re: *Kleinman v. Roc Capital Holdings LLC, et al.*
Case No.: 1:22-cv-02566-ALC

Dear Judge Carter:

This firm represents Defendants Chaim Porges and Helena Porges in the above-referenced action. We write jointly with Plaintiff Abraham Kleinman to inform the Court that the parties are actively engaged in settlement discussions and hope to reach a resolution in the near future. Accordingly, we respectfully request a complete stay of all proceedings, including a stay of the current briefing schedule on Plaintiff's application for a receiver and for expedited discovery (ECF Nos. 26, 28).

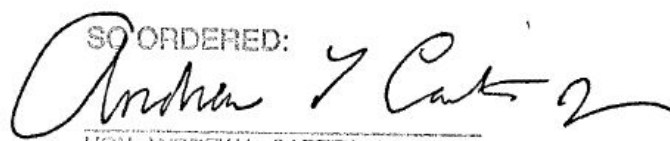
We thank the Court for its consideration of this request. Please do not hesitate to contact the undersigned should Your Honor have any questions or concerns.

Respectfully submitted,

/s/ Jeremy M. Doberman
Jeremy M. Doberman

cc: All counsel of record (via ECF and email)

Motion to stay is GRANTED.

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: June 3, 2022